



Todd & WeldLLP

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VIA ECF

April 18, 2022

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

**Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP
Request to File on *In Camera*, *Ex Parte* Basis**

Your Honor:

Defendant Alan Dershowitz (“Prof. Dershowitz”) hereby requests to file his response to Plaintiff’s Designation of Documents for *In Camera* Review (ECF No. 458), on a partially *in camera*, *ex parte* basis. In addition to submitting the designated emails on an *in camera* basis (as already ordered by the Court), Prof. Dershowitz intends to defend his privilege assertions via a written response which will, in part, describe the content of the communications being submitted for *in camera* review. He seeks leave to do so on an *in camera*, *ex parte* basis so as not to risk waiver of any applicable privilege. Pending the Court’s ruling on this request, Prof. Dershowitz will file a response to ECF No. 458 which redacts all references to the specific content of the emails. If the Court allows this request, Prof. Dershowitz will then submit an unredacted version of the letter on an *in camera*, *ex parte* basis.

Respectfully submitted,

/s/ Christian G. Kiely
Christian G. Kiely

cc: All counsel of record, via ECF